



P.O. BOX 33376 • HOUSTON, TEXAS 77233-3376
713/733-7421 • Texas Inwats 1-800-392-5670

September 20, 1988

3200

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DOO7

Mr. Ed Hatton
Texas Water Commission
P.O. Box 13087 Capitol Station
Austin, Texas 78711

Dear Mr. Hatton:

On August 1, 1988, an Industrial and Solid Waste inspection was conducted at our facility by Texas Water Commission Representative Linda Kuhn. The following is a response to the seven alleged violations noted during her inspection:

1. 31 Texas Administrative Code 335.6(C) Notification Requirements
"Wood Protection has not registered its solvent wastes with T.W.C."

At this time, I would like to add a waste stream to our solvent wastes. We have a parts cleaner in our maintenance shop which is serviced by Safety-Kleen, Inc. Enclosed is a Material Safety Data Sheet and Uniform Hazardous Waste Manifest.

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2. 31 T.A.C. 335.13(B) Record Keeping and Reporting Procedures
"Wood Protection has not submitted a Shipment Summary for all of 1987 or 1988."

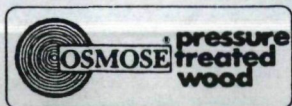
1,000 lb. of hazardous wastes were shipped in 1987 and 1,000 lbs. have been shipped to date for 1988. I have contacted Vanessa Schiller in your Austin office and she is to mail to Wood Protection Company the Shipment Summary forms. As soon as I receive them, I will forward to you the completed form.

3. 31 T.A.C. 335.9(A)(2) Recordkeeping and Annual Reporting Procedures
Applicable to Generators of Hazardous Wastes.

The 1987 Annual Report was not submitted until February 25, 1988. As it is too late to correct this past incident, I will see to it that the 1988 Report is in your office by January 25, 1989.

4. 31 T.A.C. 335.10(B)(5) and 335.10(B)(22) Shipping and Reporting
Procedures Applicable to Generators of Hazardous or Class I Wastes.

Our T.W.C. registration number TX32010 and T.W.C. Waste Classification



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Code D004, D007, has been added to our Uniform Hazardous Waste Manifest by our chemical supplier who contracts for the waste to be picked up and delivered to Earth Industrial Waste Management, Inc., located at 3536 Fite Road, Millington, Tennessee, 38053, U.S. EPA ID number TND000614321.

5. 31 T.A.C. 335.69(F)(4) Accumulation Time

All drums which are presently on location are clearly marked as "Hazardous Waste" and have the beginning accumulation date posted on them.

6. 31 T.A.C. 335.69(F)(2) CFR 265.173(A) Containers

All drums at Wood Protection Company are now, and will be in the future, kept sealed at all times, except when the addition of waste deems it necessary that the drums be opened.

7. 31 T.A.C. 335.6(F) Notification Requirements

At this time, I would like to classify my waste as: Waste, Poisonous Solid, N.O.S., Poison B (Arsenic Acid, Chromic Acid, EPA EP Toxicity) RQ UN2811. In addition, I would like to update my Notice of Registration with the current contact at Wood Protection to be as follows: Marc Hoover, General Manager and Jim Moncrief, Production Supervisor.

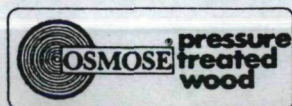
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900670 D004 + D007

Sincerely,

Marc Hoover
General Manager
Wood Protection Company

MH/md

cc: Linda Kuhn
T.W.C.



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